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Attorneys for Defendant CITY OF VALLEJO

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

NEFTALI MONTERROSA, individually and as co-successor-in-interest to Decedent SEAN MONTERROSA; NORA MONTERROSA, individually and as co-successor-in-interest to Decedent SEAN MONTERROSA; MICHELLE MONTERROSA, individually; ASHLEY MONTERROSA, individually,

Plaintiffs.

VS.

CITY OF VALLEJO, a municipal corporation; JARRETT TONN, individually, and, Vallejo police officers DOES 1-25, inclusive.

### Defendants.

**Case No:** 2:20-cv-01563-DAD-DB

**DEFENDANT CITY OF VALLEJO'S  
NOTICE OF MOTION AND MOTION  
FOR PROTECTIVE ORDER**

Date: January 5, 2023

Time: 10:00 a.m.

Crtrm: 27

TO ALL PARTIES AND THEIR COUNSEL OF RECORD HEREIN:

**PLEASE TAKE NOTICE** that on January 5, 2024 at 10:00 a.m. in Courtroom 27 of the above Court, Defendant City of Vallejo will and hereby does move for a protective order to limit the scope of Plaintiffs' deposition subpoena issued pursuant to FRCP 30(b)(6).

This motion is based on this Notice of Motion and Motion, the Joint Statement re Discovery Disagreement which shall be filed next week, and on such other written and oral

1 argument as may be presented to the Court.

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3 DATED: December 14, 2023

Respectfully submitted,

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5 /s/ Katelyn M. Knight  
6 KATELYN M. KNIGHT  
7 Attorneys for Defendant  
CITY OF VALLEJO

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